

EXHIBIT D



Advocates for Workplace Fairness

October 19, 2020

Via Email

Elise Bloom
Proskauer Rose LLP
11 Times Square
New York, NY 10036
E-mail: ebloom@proskauer.com

**Re: *Donna Wood et al. v. Mike Bloomberg 2020, Inc. (20-cv-2489)*
Plaintiffs' Responses to Defendant's First Request for the
Production of Documents and First Set of Interrogatories**

Dear Counsel,

Enclosed please find Plaintiffs' responses and objections to Defendant's First Requests for the Production of Documents and First Set of Interrogatories. Plaintiffs will produce documents responsive to Defendant's document requests on a rolling basis, beginning on or before October 26, 2020 and concluding no later than November 2, 2020. We have been unable to get in contact with two of the Plaintiffs to complete their discovery responses: Plaintiffs Daniel Smith and Ayo Tillman. We will continue to try to contact them to provide responses; however, please let us know if Defendant wishes instead to select two other Plaintiffs to respond to discovery in their place.

Plaintiffs write also to notify Defendant that they intend to amend the Complaint. First, Plaintiffs plan to substitute the California class representative, currently Alexandra Marie Wheatley-Diaz, with Robin Ceppos, and the Michigan class representative, currently Zia Oram, with Clem Wright. Second, Plaintiffs plan to plead representative claims under the California Private Attorneys' General Act, Cal. Lab. Code §§ 2698, *et seq.*, as they submitted their PAGA Notice to the California Labor and Workforce Development Agency on March 31, 2020, a copy of which was mailed to Defendant on or about April 7, 2020, and the 65-day exhaustion deadline has now expired. Please advise whether Defendant consents to the filing of the Third Amended Complaint.

As far as timing, Plaintiffs intend to amend the Complaint after the Court has decided Defendant's Partial Motion to Dismiss the Second Amended Complaint, ECF No. 110, though if the motion is not decided in the next six weeks, Plaintiffs will need to amend the Complaint in order to assert Plaintiffs' PAGA claims prior to the running of the statute of limitations. In light of Plaintiffs' amendments listed above, Plaintiff Ceppos has responded

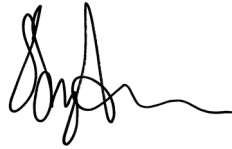
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and Plaintiff Wright will respond soon to Defendant's discovery requests instead of Plaintiffs Wheatley-Diaz and Oram, who had been selected as discovery respondents due to their role as class representatives.

Please let me know if you would like to schedule a call to discuss any of the matters above.

Sincerely,

A handwritten signature in black ink, appearing to read 'Deirdre A. Aaron', with a long horizontal flourish extending to the right.

Deirdre A. Aaron

Cc: All Counsel of Record, via Email

Enclosures